

LCI's 'Fast Track' proposal contains **seven minimum elements**, which must all be taken together for the proposal to be implemented, and which are all necessary to reduce RBOCs conflict of interest:

- NetCo and ServeCo would not share facilities, functions, services, employees or brand names;
- NetCo would not engage in any retail marketing, but would continue to service its existing customer base on a transitional basis until those customers are won by ServeCo or other retail competitors;
- NetCo would deal with ServeCo only on an equal (not "separate but equal") basis with all other new entrants – such as LCI – who use NetCo's network to provide local phone service;
- Substantial public ownership of ServeCo (approximately 40% or more);
- Independent directors on the ServeCo board, including representatives of the non-HoldCo shareholders;
- Compensation for ServeCo management based only on ServeCo performance, not the performance of HoldCo or NetCo; and
- As a key transitional matter, ServeCo would not provide stand-alone long-distance service to a NetCo customer until customers can be switched among competing providers of local services as easily as they are switched among long-distance companies today. At that point, a state commission could also decide to require balloting and allocation of NetCo's remaining customer base.

Importantly, the LCI plan in no way limits the ability of particular state PSCs to take other action to promote local competition and to protect their consumers with measures suited to their local situations.

Outcome:

LCI believes its 'Fast Track' proposal promises **numerous benefits** for consumers, RBOCs, long-distance companies, the FCC and state regulatory agencies. The 'Fast Track' proposal would:

- **Bring competition to local phone markets – and especially to residential customers – faster than could presently be expected.**
- **Provides a simpler and faster way for RBOCs to meet their Section 271 obligations.**
- **Allows the RBOCs to offer their own retail services on a substantially unregulated basis because incentives and opportunities for discrimination are reduced.**

CERTIFICATE OF SERVICE

I, Barbara E. Clocker, hereby certify that on this 25th day of September, 1998, a copy of the Comments of Qwest Communications Corporation filed in CC Docket No. 98-147 was hand delivered to the parties listed below.


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